

Hearing Date and Time: August 3, 2009, 9:45 a.m. (ET)

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(Notice of Limited Appearance filed herein)
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(Affected Dealer)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

GENERAL MOTORS CORP., et al.

**CHAPTER 11 CASE NO.
09-50026 (REG)**

(Jointly Administered)

Debtors.

/

OBJECTION OF NORMAN-BLACKMON MOTOR COMPANY, INC.
TO DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105 AND
365 AUTHORIZING (A) THE REJECTION OF EXECUTORY
CONTRACTS AND UNEXPIRED LEASES WITH CERTAIN
DOMESTIC DEALERS AND (B) GRANTING
CERTAIN RELATED RELIEF

COMES NOW, NORMAN-BLACKMON MOTOR COMPANY, INC., [herein
“Norman-Blackmon”] by and through its undersigned attorney and objects to
the Debtors’ Motion for the rejection of unexpired Leases with certain domestic
dealers and for grounds would state:

1. Norman-Blackmon is a franchise dealership located in Greenville,
Alabama.
2. Norman-Blackmon has enjoyed a profitable business relationship
with the Debtor for many years and has complied with all terms and conditions
of their Franchise Agreement.

3. Norman-Blackmon provides a much needed service to its customers in Greenville, Alabama and the surrounding area.

4. By letter of June 1, 2009 from General Motors Corporation, Norman-Blackmon was offered to participate in the Wind-Down Agreement.

5. Norman-Blackmon did not participate in the Wind-Down as it was not in their best interest.

6. Granting of the Debtors' Motion made pursuant to 11 U.S.C. §365 is not made in good faith and will cause undue hardship upon Norman-Blackmon.

WHEREFORE, Norman-Blackmon respectfully requests that this Honorable Court deny the Debtors' Motion Pursuant to 11 U.S.C. §365 to reject their Franchise Agreement and grant such other and further relief as the Court deems just and proper.

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GENERAL MOTORS SERVICE LIST

ALL SERVICE POSTAGE PREPAID VIA U.S. MAIL

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